

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

ASCENTIUM CAPITAL LLC,
Plaintiff,

v.

DIGITAL SIGN SOLUTIONS LLC and
ARVIN WADDLES,
Defendants.

* CIVIL ACTION NO. 5:21-cv-00255
* JUDGE ELIZABETH E. FOOTE
* MAGISTRATE MARK L. HORNSBY

**PLAINTIFF'S RULE 69 & 45(g) MOTION FOR CONTEMPT, SANCTIONS, AND TO
COMPEL POST-JUDGMENT DISCOVERY PARTICIPATION FROM ARVIN
WADDLES & DIGITAL SIGN SOLUTIONS, L.L.C.**

Plaintiff, Ascentium Capital LLC (“Ascentium”), respectfully files its *Rule 69 and 45(G) Motion for Contempt, Sanctions, and to Compel Post-Judgment Discovery Participation From Arvin Waddles And Digital Sign Solutions, L.L.C.* (the “Motion”) and, for the reasons set forth in the Memorandum in Support filed contemporaneously herewith, respectfully seek an order (1) holding Defendants, Arvin Waddles (“Waddles”) and Digital Signs Solutions, LLC (“DSS,” and collectively with Waddles, “Defendants”), liable for civil contempt pursuant to Federal Rule 45(g); (2) compelling these Defendants to appear for their depositions and to produce certain documents (the “Agreed Documents”) within thirty (30) days or, if they fail to so comply, directing the United States Marshals to arrest and detain Waddles until he purges his contempt by making arrangements to appear for his (and DSS’s) deposition and to produce the Agreed Documents; (3) sanctioning these Defendants by ordering them to pay Ascentium’s reasonable costs and attorney fees incurred in the preparation of this Motion, and Ascentium’s reasonable attorney fees and costs incurred preparing for the two continued depositions of Defendants; and (4) granting all other relief to the Court deems just and appropriate under the circumstances.

WHEREFORE, Ascentium respectfully requests that the Court grant this motion and enter an Order compelling Defendants as noted above.

RESPECTFULLY SUBMITTED

/s/ Lacey E. Rochester

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this the 1st day of June 2022, I served the foregoing pleading on Defendants at the addresses listed below by U.S. Mail.

Digital Sign Solutions, LLC

Through its Registered Agent, Arvin Waddles
4600 Victory Drive
Apartment #73
Marshall, Texas 75672

Arvin Waddles

Through its Registered Agent, Arvin Waddles
4600 Victory Drive
Apartment #73
Marshall, Texas 75672

/s/Lacey E. Rochester